



May 29, 2019

The Honorable David T. Schultz
United States District Court
9E U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Re: Fair Isaac Corp. v. Federal Insurance Co. and ACE Insurance Co.,
No. 16-cv-01054-WMW-DTS (D. Minn. filed April 21, 2016)

Dear Judge Schultz:

We write to respectfully request an expedited phone conference with the Court to discuss the need for Defendants to have access to FICO's damages report (the "Zoltowski Report") to adequately prepare for the upcoming Settlement Conference. The Zoltowski Report was initially marked Attorney's Eyes Only. Defendants raised the issue of improper designation of the Zoltowski Report as AEO weeks ago. Defendants have attempted to come to an agreement with FICO to allow adequate access to the Zoltowski Report. However, it has become clear after lengthy negotiations that an agreement that allows adequate access is not feasible in the short term. If Defendants are not allowed to discuss the underlying damages calculations that FICO relies upon among senior management, they cannot adequately prepare for settlement negotiations. In light of the time sensitive need to prepare for the Settlement Conference, we request a phone conference as early as possible to discuss this issue and come to a resolution.

Very truly yours,

s/Leah C. Janus

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LCJ/cah

cc: All Counsel of Record